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Attorneys for Plaintiffs Eduardo I.T.; Edwin E.I.I.; Ignacio P.G.; Leonel Y.P.G., a minor child;
Benjamin J.R.; and William A.J.M.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

EDUARDO I.T., EDWIN E.I.I., Ignacio P.G.,
Leonel Y.P.G., a minor child, Benjamin J.R., and
William A.J.M.

Plaintiffs,

vs.

UNITED STATES OF AMERICA

Defendant.

Case No. 4:22-cv-05333-DMR

**DECLARATION OF EDUARDO I.T. IN
SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANT'S
MOTIONS TO TRANSFER AND
DISMISS**

DEMAND FOR JURY TRIAL

1 I, Eduardo I.T., declare as follows:

- 2 1. I am a plaintiff in this action. I have personal knowledge of the facts stated in this
3 declaration and, if called as a witness, could and would testify competently as to those facts. I
4 understand that the Court has allowed me to litigate this case using a pseudonym. I am signing
5 this name using my pseudonyms and I refer to my son by his pseudonym.
- 6 2. I intend to testify at the trial in this matter.
- 7 3. I am the father of plaintiff Edwin E.I.I. Edwin is years 20 old. Edwin lives with me.
- 8 4. Traveling to Arizona for trial would be a burden to me and Edwin. I do not have fixed
9 employment and work as a day laborer on projects like carpentry and construction. I am generally
10 paid by the day. On days when I do not work, I do not earn anything—I have no paid time off.
11 Edwin also does not have fixed employment. From time to time, he does short-term work. When
12 he works, he contributes to our shared expenses.
- 13 5. I do not have the financial resources necessary to litigate this case in Arizona. My
14 family's financial situation has been unstable since our arrival to the United States. We
15 consistently must make difficult decisions about how to pay for housing and basic necessities. I
16 do not have extra funds to pay for my son and me to travel to Arizona and pay for lodging and
17 other costs there.

18 I declare under penalty of perjury under the laws of the State of California that the
19 foregoing is true and correct. This declaration was executed on December 15, 2022 at Oakland,
20 California.

21
22 /s/ Eduardo I.T.
EDUARDO I.T.

23
24 The undersigned attests that concurrence in the filing of this declaration has been obtained from
25 all signatories. Executed this 21st day of December, 2022.

26 /s/ Dustin Chase-Woods
DUSTIN CHASE-WOODS

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**CERTIFICATES OF
INTERPRETATION**

DEMAND FOR JURY TRIAL

1 ENGLISH-SPANISH CERTIFICATE OF TRANSLATION

2 My name is Bree Bernwanger and I am competent to translate from English to Spanish. I
3 translated the foregoing document and following certificate of interpretation from English to
4 Spanish and read it to Lleny Morales Nolasco in Spanish. Ms. Morales Nolasco affirmed that she
5 fully understood the interpretation.

6 I declare under penalty of perjury that the foregoing is true and correct. Executed this 15th day of
7 December 2022 in Berkeley, California.

8 /s/ Bree Bernwanger
9 Bree Bernwanger

10 SPANISH-Q'EQCHI' CERTIFICATE OF TRANSLATION

11 My name is Lupe Lopez and I am competent to translate from Spanish to Q'eqchi'. I listened to
12 the Spanish interpretation of the foregoing document provided by Bree Bernwanger, and I
13 concurrently translated the document's contents to the declarant, Eduardo I.T., in Q'eqchi'.
14 Eduardo I.T. affirmed that he fully understood the interpretation, and that the contents of the
15 foregoing document are true and correct.

16 I declare under penalty of perjury that the foregoing is true and correct. Executed this 15th day of
17 December 2022 in Oakland, California.

18 /s/ Lupe Lopez
19 Lupe Lopez

20 The undersigned attests that concurrence in the filing of these certificates of interpretation has
21 been obtained from all signatories. Executed this 21st day of December, 2022.

22 /s/ Dustin Chase-Woods
23 DUSTIN CHASE-WOODS